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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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Federal Communications Commission  
Office of Secretary

In the Matter of:

Amendment of Section 74.701  
of the Commission's Rules

Definition of Television Broadcast  
Booster Station

MB Docket No. \_\_\_\_\_

To: The Commission

**PETITION FOR RULEMAKING**

Word of God Fellowship, Inc. ("WOGF"), by its attorneys, hereby requests that the Commission initiate, and complete, a rulemaking proceeding looking toward the amendment of Section 74.701(i) of the Rules and Regulations to include provision for digital television (DTV) stations. In support, the following is submitted:

WOGF, and affiliates, are licensees of a number of television broadcast stations throughout the United States. In some cases, the licenses are for analog television channels and paired digital television channels. In other cases, the licenses are for single channels which, at an appropriate time, will "flash cut" to digital.

Section 74.701(i) of the Rules defines a television broadcast booster station. Basically, the definition specifies that such a station operates on the same frequency or channel as the primary station being rebroadcast and located such that the service area of

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the booster station is entirely within the protected contour of the primary station. The final sentence of this subsection reads as follows:

For purposes of this paragraph, the service area of the booster and the protected contour of the primary station will be determined by the methods prescribed in §74.705(c).

Section 74.705 deals with TV broadcast analog station protection. Subsection (c) prescribes the method for determining the field strength of a low power TV, TV translator or TV booster station.

Section 74.706 deals with digital TV (DTV) station protection. Subsection (c) of that rule prescribes the method for calculating the field strength of a low power TV, TV translator or TV booster station.

Since television stations have begun broadcasting with full authorized DTV facilities, and more will shortly be so broadcasting, and since the Commission is authorizing stations to discontinue broadcasting with their analog facilities, applications for DTV boosters will be necessary in many cases. Under Section 74.701(i) as presently written, the service area of a DTV booster must be within the protected contour of the primary station's analog signal, even if that signal no longer exists.

WOGF urges the Commission to amend Section 74.701(i) such that the final sentence reads substantially as follows:

For purposes of this paragraph, the service area of the booster and the protected contour of the primary station will be determined by the methods prescribed in § 74.705(c) or § 74.706(c).

WOGF further urges the Commission to adopt this rule change without a formal notice and comment proceeding. The requested change is a non-substantive technical

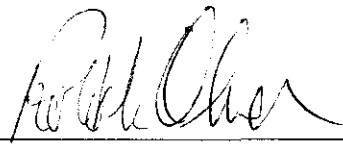
change to an existing rule or an interpretative change, and thus exempt from the notice and comment requirement of the Administrative Procedures Act. See 5 U.S.C. § 553(b)

It is noted that DTV stations were recognized, and provision was made for them in Section 73.3572(a)(4) of the Rules dealing with displacement applications, including displaced booster stations. Thus, the failure of Section 74.701 to recognize DTV stations is undoubtedly an inadvertent oversight. The correction of this oversight will not adversely affect any existing or proposed licensee, permittee or applicant.

**ACCORDINGLY**, WOGF respectfully requests that the Commission initiate and complete a rulemaking proceeding modifying the language of Section 74.701(i) as indicated.

Respectfully submitted,

**WORD OF GOD FELLOWSHIP, INC.**

By:   
Robert L. Olender  
James A. Koerner  
Its Attorneys

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**Koerner & Olender, P.C.**  
11913 Grey Hollow Court  
North Bethesda, MD 20852  
(301) 468-3336

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